DOCKET FILE COPY ORIGINAL

ORIGINAL

145

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

RECEIVED

JUL 17 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re:		
Amendment of Section 73.606 Table of Allotments TV Broadcast Stations Brawley, California	)	MM Docket No.

To: Chief, Allocations Branch
Policy and Rules Division

PETITION FOR RULEMAKING

The Board of Trustees, The California State University for San Diego State University ("SDSU"), by its counsel and pursuant to the *Public Notice*, in DA 99-2605, dated November 22, 1999, hereby requests that the Commission institute a rulemaking proceeding to amend Section 73.606 of its Rules to substitute TV Channel *43 in lieu of TV Channel *26 at Brawley, California, and to continue to reserve the allocation for noncommercial educational use.[1] This substitution would serve the public interest because it would bring the first full service public television broadcasting service to Brawley and surrounding communities in the Imperial Valley. In addition, as the attached technical documentation demonstrates, SDSU's proposal on Channel *43 will not cause impermissible interference to any other stations.

Background

SDSU is a public institution of higher education in the State of California. To fulfill its educational mandate, SDSU operates noncommercial educational television Station KPBS(TV),

[1] By this *Public Notice*, the Mass Media Bureau announced a window filing opportunity to allow applicants with certain pending requests for new analog (NTSC) television stations on Channels 2-59 at locations inside of the "TV Freeze Areas" to file petitions for rule making to change allotments to eliminate technical conflicts with DTV stations.

No. of Copies rec'd 0+4
List A B C D E
MMB

San Diego, California, and UHF translator Stations in La Jolla, California. Well over two years ago, SDSU filed an application with the FCC to construct a full service NTSC station on TV Channel *26 at Brawley. In this application, SDSU requested a waiver of the freeze on the acceptance of applications to construct new television stations within the "freeze area." This application remains pending at the Commission in FCC File No. BPET-19960920WU. However, due to a conflict with a new Mexicali, Mexico allotment on DTV Channel 25, SDSU's full service NTSC public television application cannot now be processed for that channel. Had the FCC protected SDSU's application for a new educational TV station at Brawley, or protected the applied-for Brawley educational allotment during the U.S./Mexico negotiations for DTV channels, SDSU would not be forced to change channels in order to avoid DTV interference to the Mexicali Channel 25 allotment. Thus, SDSU seeks this channel change in order to protect a Mexican allotment that the FCC permitted to conflict with SDSU's pending NTSC application for Ch. 26 at Brawley, California.

Consequently, SDSU has located a new channel for its new full service station at Brawley to avoid dismissal of its pending Brawley application. Accordingly, SDSU now seeks to substitute Channel *43 in lieu of Channel *26 for the Brawley allotment.

In support of this petition, SDSU submits the following:

The Substitution of TV Channel *43 at Brawley, California Satisfies Technical and Regulatory Requirements

The present proposal satisfies the minimum geographic spacing requirements with regard to all other analog TV stations and DTV stations, including DTV authorizations, applications, allotments and pending rule making proposals. See Engineering Statement. In addition, as demonstrated in the attached engineering statement, interference to the Mexicali, Mexico allotment of DTV Channel 25 would be caused if the requested channel change is not made.

The substitution of TV Channel *43 at Brawley complies with the requirements of Section 73.606 of the Commission's Rules.

Substitution of TV Channel *43 at Brawley, California, Would Provide Brawley with a Valuable Source of Noncommercial Educational Programming.

The FCC decision in the *Second Memorandum Opinion and Order*, in MM Docket No. 87-268, 14 FCC Rcd 1348 (1998) will result in the dismissal of SDSU's pending full service TV Channel *26 application, precluding over-the-air television service in the Brawley area. Accordingly, substitution of TV Channel *43 in lieu of TV Channel *26 in Brawley would provide the Imperial Valley, California and Yuma, Arizona regions with their first noncommercial educational television reception service ever. Clearly, this channel substitution is in the public interest.

The Commission recognizes the value of local programming, especially in noncommercial, educational broadcasting. See, e.g., Educational TV Assignment at Terre Haute, Indiana, 19 RR 2d 1850, 1853 (1970) ("We have repeatedly announced our policy to further local programming in the broadcast services. Local programming is essential particularly in the field of education in that local programming can most effectively deal with the specific problems, needs, and interests in the community being served.").

CONCLUSION

For all of these reasons, SDSU requests that the Commission institute a rulemaking proceeding to amend Section 73.606 of its Rules to substitute TV Channel *43 for TV Channel *26 at Brawley, California. The Commission's decision to permit the allotment of DTV Channel

25 at Mexicali, Mexico is the reason that this channel change is necessary. If the Commission grants this petition and modifies the TV Table of Allotments accordingly, SDSU is committed to amending its pending application and constructing its TV station on Channel *43.

Respectfully submitted,

THE BOARD OF TRUSTEES, THE
CALIFORNIA STATE UNIVERSITY FOR SAN
DIEGO STATE UNIVERSITY

By: _____

Todd D. Gray
Margaret L. Miller
Christine J. Newcomb

Attorneys for Petitioner

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 776-2000

July 17, 2000

Engineering Statement
prepared for
The Board of Trustees
The California State University for San Diego State University
Brawley, California
Ch. 43 5000 kW 295 m

This engineering statement has been prepared on behalf of *The Board of Trustees, The California State University for San Diego State University ("Trustees")*, an applicant for vacant NTSC (analog) television Channel 26, allotted to Brawley, California. As indicated in a November 19, 1999 Public Notice[1] with respect to such pending applications, the Federal Communications Commission will accept a *Petition for Rulemaking* to propose substitution of another channel to remove a conflict with a digital television (DTV) station. The instant statement supports a *Petition for Rulemaking* on behalf of *Trustees,* to propose a substitute channel, as outlined in the November 19, 1999 Public Notice. NTSC Channel 43 is sought as a replacement channel for Brawley, California.

Discussion

The site originally proposed by *Trustees* for Channel 26 does not meet certain distance requirements with respect to a subsequent Mexican DTV allotment for Channel 25 at Mexicali, BC. Specifically, the distance from *Trustees'* proposed Channel 26 site to the Mexicali DTV Channel 25 allotment is 79.3 km, which does not meet the required distance of 10 km or less or 88 km or more.[2] Allocation studies indicated that the pending Channel 26 proposal could not be suitably modified to avoid conflict with nearby DTV and NTSC allotments and still provide effective coverage to Brawley and the surrounding area. Accordingly, a substitute NTSC channel is proposed herein for Brawley, California.

---

[1]See November 19, 1999, 1999 Public Notice *Mass Media Bureau Announces Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations,* DA 99-2585. The window was extended to July 15, 2000, as described in a Public Notice of March 9, 2000 *Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations Extended to July 15, 2000,* DA 00-536.

[2]Mexican allotments and required distances were obtained from Memorandum of Understanding Between the Federal Communications Commission of the United States of America and the Secretaria de Comunicaciones Y Transportes of the United Mexican States Related to the Use of the 54-72 MHz, 76-88 MHz and 470-806 MHz bands for the Digital Television Broadcasting Service Along the Common Border.

An engineering review of the DTV allotments and NTSC assignments in the region surrounding Brawley showed that an alternate channel could be used for the Channel 26 NTSC allotment. The minimum distance separation requirements of §73.610 and §73.698 were applied to domestic NTSC assignments. With respect to domestic DTV allotments and facilities, detailed interference studies were conducted in accordance with §73.623(c) (as required in the November 19, 1999 Public Notice). Consideration was given to Low Power Television (LPTV) stations that are listed as eligible for Class A status. Finally, distance separation requirements to Mexican NTSC and DTV assignments was considered. The studies showed that NTSC Channel 43 could be used at Brawley at 5000 kW effective radiated power (ERP) and an antenna height above average terrain (HAAT) of 295 meters.

The technical data for the proposed Channel 43 allotment are summarized below. The site specified should be considered as an allotment "reference" point. The power and height combination is specified as shown (for the proposed "reference" point) as a basis to avoid interference to DTV stations and a Low Power Television (LPTV) station eligible for Class A status. Brawley is fully encompassed by the City Grade (80 dBμ) contour from the proposed Channel 43 allotment.

Summary Technical Data for Proposed NTSC Channel 43

Coordinates (NAD-27)	33° 05' 00" N-Lat 115° 32' 00" W-Lon
Channel	43
Effective Radiated Power	5000 kW (non-directional)
Antenna Height	299 m AGL 250 m AMSL[3] 295 m HAAT

[3]Ground elevation at the allotment point is 49 meters *below* mean sea level. Terrain data is for U.S.G.S. 3 second digitized terrain database.

Domestic NTSC Allocation Considerations

A study of distances to other domestic NTSC facilities from the proposed transmitter site is supplied as **Table 1**. As shown thereon, the minimum distance separation requirements of §73.610 and §73.698 are met.

With respect to carrier frequency offset, the required offset for nearby co-channel NTSC facilities was reviewed. The only domestic co-channel full service station within 1000 km is KGMC (TV) (Clovis, CA, 531.5 km distant), which is licensed to operate with "Zero" frequency channel offset. Further, LPTV station K43DM (San Marcos, CA, 134.4 km), eligible for Class A status (as described later in this text), is licensed with "Zero" offset. The only other nearby co-channel LPTV / translator stations within 200 km are K43EE (Lucerne Valley, CA, 197.4 km) and K62BN (CP, Lake Havasu City, AZ, 199.9 km), and both of these stations are authorized with "Plus" offset. Based on the offsets used by these nearest co-channel stations, a "Minus" frequency offset is suggested and hereby requested. Should the Commission's review suggest an alternative offset is more desirable, then the petitioner will agree to either alternate offset ("Plus" or "Zero").

Domestic DTV Allocation Considerations

The proposed site is located at an insufficient distance from the Los Angeles, California metropolitan area to satisfy the requirements of the FCC's July 17, 1987 "freeze" Order regarding spectrum for advanced television. The Los Angeles reference point is 273.5 km from the proposed Channel 43 allotment point. The minimum Zone II co-channel separation distance for UHF stations is 280.8 km, per §73.610(b). Thus, the proposed site is within the "freeze" area for Los Angeles, CA.

In the pending *Trustees* application, a waiver of the 1987 freeze order was requested. Considering that the Commission's final digital television ("DTV") allotment table has been released,[4] an evaluation can be made of the impact of the proposed Channel 43 facility on DTV allotments.

[4]MM Docket 87-268 Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders, FCC 98-315, released December 18, 1998.

Criteria for evaluating the impact of NTSC station proposals were released in the Commission's August 10, 1998 Public Notice entitled *"Additional Application Processing Guidelines for Digital Television."* In that Public Notice, the Commission's Mass Media Bureau stated that NTSC "proposals are not permitted to cause any additional interference to DTV" assignments or stations. The same Public Notice states that for NTSC minor modifications, the determination of interference to DTV facilities (as calculated per OET Bulletin 69) will be rounded to the nearest percent. The November 19, 1999 Public Notice regarding the channel change proposed herein requires that interference criteria (as described above and in §73.623(c)) be utilized to evaluate the new channel facility's impact on DTV.

Accordingly, a study was conducted to evaluate the change in interference to pertinent DTV assignments that may be attributed to the proposed Channel 43 facility. A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").[5] The interference study examined the net change in interference as experienced by DTV stations that would result from the proposal.

All stations considered in this study are listed in **Table 2**. As shown in **Table 2**, any increase in interference to DTV facilities is zero, when rounded to the nearest whole percent (per Commission policy). No interference is predicted to any other DTV station or allotment. Thus, this proposal is believed to be in compliance with Commission policy regarding NTSC channel changes as they may

[5]The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein, except that the terrain profile step size is 0.1 km (which provides a finer resolution than the Commission's standard 1 km step size). A standard cell size of 2 km was used. The Longley-Rice computer program input data, following the guidelines established under OET-69, includes a location variability of 50%, a time availability of 10%, a situation variability of 50%, horizontal polarization, 0.005 S/m conductivity, a climate constant of 15, an assumption of a continental temperate climate zone, and a receive antenna height of 10 meters. The service area for each DTV facility under study is that area predicted to receive signal levels of at least 41 dBμ using the Longley-Rice methodology, and within the DTV F(50,90) service contour distance as determined per §73.625(b). In instances where the DTV reference ERP is 50 kW or 1,000 kW, the Grade B contour of the associated analog station is used to determine the extent of the DTV station's service area. The F(50,90) DTV service contour level is established by the formula 41 - 20log[615/(channel mid-frequency)] dBμ. Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

affect DTV. Accordingly, based on the results of this study, it is believed that there will be no impact to domestic DTV assignments as a result of the instant proposal. If a waiver of the Commission's 1987 Freeze Order is required, then one is respectfully requested on behalf of *Trustees*.

Class A Television

An allocation study of possible conflicts was conducted with respect to LPTV / translator stations that may be eligible for Class A status.[6] The study determined that the LPTV / translator stations listed in the attached **Table 3** are close enough to the proposed NTSC Channel 43 allotment facility to warrant detailed review.

Of the stations listed in **Table 3**, contour overlap (or insufficient distance spacing) exists between *Trustee's* proposed NTSC Channel 43 allotment and each of the facilities listed below, under Section 73.613 and/or 74.705 of the Commission's Rules. A description of how the overlap (or spacing) does not create a conflict with Class A television is also provided below.

Station	Channel	Disposition
K22FJ (APP)	36	See Note 1
K43DM (LIC)	43	See text below
K43EE (LIC)	43	See Note 1
K62BN (CP)	43	See Notes 1, 2

Note 1: Station is not on the Commission's June 2, 2000 list of stations deemed eligible to file an application for Class A station status, and protection is therefore not required.[7]

Note 2: Station is on the Commission's June 7, 2000 list of stations that are or were licensees of television translator broadcast stations during the 90-day period ending November 28, 1999. Since Class A eligibility is limited only to low power television licensees, its statement of eligibility was deemed materially deficient and dismissed.[8] Thus, protection is not required.

---

[6]The Commission recently created a new class of television stations. See *Establishment of a Class A Television Service*, MM Docket 00-10, FCC 00-115, released April 4, 2000.

[7]See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

[8]See June 7, 2000 Public Notice *Dismissal of TV Translator Licensee Certificates of Eligibility for Class A Television Station Status*, DA 00-1227.

Station K43DM is on the Commission's June 2, 2000 list of stations deemed eligible to file an application for Class A station status. Contour overlap with K43DM (that would be prohibited under §73.613 and §74.705) would occur with respect to the proposed Channel 43 facility. However, there is terrain blockage between the K43DM service area and the proposed Channel 43 facility. A study using the terrain dependent Longley-Rice point-to-point propagation model of OET Bulletin 69 showed that no interference is expected to occur to K43DM from the proposed Channel 43 facility. Further, the study showed that interference is not expected to occur to the proposed Channel 43 facility from K43DM. Thus, on the basis of an OET Bulletin 69 analysis, there will be no interference between these facilities. If a waiver of the Commission's contour overlap rules is required (§73.613 and/or §74.705), then one is respectfully requested on behalf of the applicant for the reasons stated above.

No other LPTV stations listed in **Table 3** would experience or cause interference with respect to the proposed Channel 43 facility.

International Considerations

The site is 47 km from the common border between the U.S. and Mexico, within the 275 kilometer coordination zone. Accordingly, pertinent Mexican DTV and NTSC allotments are listed in the attached **Table 4**. The Mexican assignments and required distances to DTV stations are from the July 22, 1998 memorandum between the Commission and Mexican counterparts;[9] minimum distances to NTSC assignments are obtained from the 1980 U.S. - Mexican agreement, as modified.[10] As shown in **Table 4**, the distances are satisfied with respect to all Mexican assignments. Coordination with Mexican authorities is requested, as required.

[9]See Footnote 2.

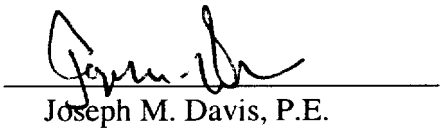
[10]Agreement relating to Assignments and Usage of Television Broadcasting Channels in the Frequency Range 470-806 MHz (Channels 14-69) Along the United States - Mexico Border.

Summary

It is proposed that NTSC Channel 43 be allotted to Brawley, California as a substitute for Channel 26. The proposed allotment site complies with minimum distance spacing requirements with respect to other domestic NTSC facilities. The substitution will not impact any domestic DTV facility. There is no conflict with LPTV stations eligible for Class A status. Required distances to Mexican NTSC and DTV allotments are met. Principal community coverage to Brawley is provided.

Certification

Under the penalty of perjury, the undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Davis is a principal in the firm of *Cavell, Mertz & Davis, Inc.*, is a Registered Professional Engineer in Virginia, holds a Bachelor of Science degree from Old Dominion University in Electrical Engineering Technology, and has submitted numerous engineering exhibits to various local governmental authorities and the Federal Communications Commission. His qualifications are a matter of record with that entity.



Joseph M. Davis, P.E.
July 17, 2000

Cavell, Mertz & Davis, Inc.
10300 Eaton Place Suite 200
Fairfax, VA 22030
(703) 591-0110

Table 1

DOMESTIC NTSC FACILITY SPACING STUDY

prepared for

The Board of Trustees

The California State University for San Diego State University

Brawley, California

Ch. 43 5000 kW 295 m

Channel	Call	City	State	Lat / Long	Distance / Bearing	Reqrd / Clear
Applicant/Licensee						
36-	KMIR-TV LIC	Zn:2 PALM SPRINGS	, CA	33-52- 0	120.54	95.7
DESERT EMPIRE TELEVISION CORPORATION		490.00 kW 207M		116-25-56	316.36	24.84
39Z	KNSD LIC	Zn:2 SAN DIEGO	, CA	32-41-48	137.99	31.4
STATION VENTURE OPERATIONS, LP		2510.00 kW 577M		116-56- 6	252.27	106.59
42Z	KESQ-TV CP	Zn:2 PALM SPRINGS	, CA	33-38-55	114.24	87.7
GULF-CALIFORNIA BROADCAST COMPANY		1820.00 kW 1087M		116-33-34	303.57	26.54
42Z	KESQ-TV LIC	Zn:2 PALM SPRINGS	, CA	33-51-58	120.60	87.7
GULF-CALIFORNIA BROADCAST COMPANY		316.00 kW 192M		116-26- 2	316.29	32.90
43Z	960709KP	Zn:2 COOLIDGE	, AZ	32-58-39	374.81	280.8
GLOBAL ED DEVELOPMENT, INC.		0.00 kW 0M		111-31-24	90.71	94.01
43Z	960710LC APP	Zn:2 COOLIDGE	, AZ	33- 0- 4	360.55	280.8
THE AMERICAN LEGACY FOUNDATION		5000.00 kW 363M		111-40-29	90.40	79.75
44+	KRPA CP MOD	Zn:2 RANCHO PALOS VERDES	, CA	33-21- 0	264.45	87.7
RANCHO PALOS VERDES BROADCASTERS,INC		5000.00 kW 453M		118-21- 8	277.19	176.75
44+	KRPA CP MOD	Zn:2 RANCHO PALOS VERDES	, CA	33-21- 0	264.38	87.7
RANCHO PALOS VERDES BROADCASTERS,INC		5000.00 kW 451M		118-21- 5	277.19	176.68
51Z	KUSI-TV LIC	Zn:2 SAN DIEGO	, CA	32-41-49	137.95	31.4
CHANNEL 51 OF SAN DIEGO, INC.		2820.00 kW 584M		116-56- 5	252.28	106.55

Table 2

DTV STATION INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

The Board of Trustees

The California State University for San Diego State University

Brawley, California

Ch. 43 5000 kW 295 m

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Proposed Change in Interference Population (2)	Proposed Change in Interference Percentage (3)
KCAL-DT (Ref)	Los Angeles, CA 43	267.1	12,876,000	1,400	0.0
KCAL-DT (Lic 300 kW)	Los Angeles, CA 43	267.1	12,876,000	9,743	0.1 (rounds to zero)
KESQ-DT (PRM)	Palm Springs, CA 44	114.2	927,000	714	0.1 (rounds to zero)

Notes:

(1) Greater of NTSC or DTV Service Population, from FCC Table

(2) Net change in population receiving interference resulting from proposal; numbers in parenthesis indicate a *reduction* in interference

(3) Proposal's impact in terms of percentage, equals (2)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice *"Additional Application Processing Guidelines for Digital Television"*

Table 3

LPTV / TRANSLATOR STATION ALLOCATION STUDY

prepared for

The Board of Trustees

The California State University for San Diego State University

Brawley, California

Ch. 43 5000 kW 295 m

Channel	Call		City	State	Lat / Long	Distance / Bearing
Applicant/Licensee						
28N	K28FM	CP	Zn: YUMA	AZ	32-40-22	120.87
SARA DIAZ WARREN			4.90 kW	0M	114-20-13	111.81
28Z	K28FM	APP	Zn: YUMA	AZ	32-40-25	120.83
SARA DIAZ WARREN			0.99 kW	0M	114-20-13	111.77
28-	K28ET	CP MOD	Zn: PALM SPRINGS	CA	33-51-56	120.48
ENTRAVISION HOLDINGS, LLC			1.31 kW	0M	116-25-58	316.31
28+	K28EU	LIC	Zn: LAUGHLIN, ETC.	NV	35-14-50	250.84
KVVU BROADCASTING CORP.			1.12 kW	0M	114-44-35	16.67
28-	K28ET	CP	Zn: PALM SPRINGS	CA	33-52- 3	120.64
ENTRAVISION HOLDINGS, LLC			1.31 kW	0M	116-25-58	316.38
29Z	K65CP	CP	Zn: BLYTHE	CA	33-34-12	122.78
PALO VERDE VALLEY TV CLUB,INC.			0.99 kW	0M	114-20-56	63.60
29N	K29DX	CP	Zn: SAN DIEGO	CA	32-41-52	137.85
KRCA LICENSE CORP.			10.00 kW	0M	116-56- 2	252.31
36N	K36DU	LIC	Zn: LAKE HAVASU CITY, ET,	AZ	34-36-11	199.99
RICHARD D. TATHAM			1.53 kW	0M	114-22-14	32.24
36Z	K65AR	APP	Zn: TWENTYNINE PALMS,ETC,	CA	34- 4-32	116.80
COUNTY OF SAN BERNARDINO AREA 70			2.62 kW	0M	115-57-18	340.53
36N	K67BH	APP	Zn: MORONGO VALLEY	CA	34- 3-54	143.79
COUNTY OF SAN BERNARDINO AREA 70			1.08 kW	0M	116-32-42	319.49
36+	K22FJ	APP	Zn: CALEXICO	CA	32-57-12	14.71
SARA DIAZ WARREN			76.00 kW	0M	115-30- 8	168.59
36-	KDIG-LP	APP	Zn: ENCINITAS	CA	33- 6-39	151.21
BRIMARC COMMUNICATIONS			25.10 kW	0M	117- 9-10	271.60
42N	K42CP	LIC	Zn: PEACH SPRINGS	AZ	35-32-10	333.87
MOHAVE COUNTY BOARD OF SUPERVISORS			0.07 kW	0M	113-25-52	34.84
42N	K42CQ	LIC	Zn: CHLORIDE	AZ	35-23-49	285.68
MOHAVE COUNTY BOARD OF SUPERVISORS			0.07 kW	0M	114-10-16	25.68
42+	K42EU	CP	Zn: TOPOCK, ETC.	AZ	35- 2- 9	241.72
MOHAVE COUNTY BOARD OF SUPERVISORS			0.92 kW	0M	114-22-14	26.04
42N	K42AA	LIC	Zn: PAHRUMP	NV	35-58- 4	319.98
MOUNTAIN UNION TELECOM, INC.			0.28 kW	0M	115-30- 3	0.53

Table 3

LPTV / TRANSLATOR STATION ALLOCATION STUDY

Channel	Call		City	State	Lat	Distance
Applicant/Licensee					Long	Bearing
43+	K24DK	CP	Zn: BULLHEAD CITY	AZ	35- 2- 9	241.72
KUSK, INC.			0.96 kW	0M	114-22-14	26.04
43-	K43CO	LIC	Zn: CASA GRANDE	AZ	33- 0- 5	360.55
WILLIAM L. OLSON			53.30 kW	0M	111-40-29	90.40
43+	K43EE	LIC	Zn: LUCERNE VALLEY	CA	34-27-47	197.37
COUNTY OF SAN BERNARDINO AREA 29			0.90 kW	0M	116-52-44	321.21
43N	K43AG	LIC	Zn: RIDGECREST	CA	35-34- 3	338.42
KERN EDUCATIONAL TELECOMMUNICATIONS			2.27 kW	0M	117-40- 5	325.11
43Z	K43DM	LIC	Zn: SAN MARCOS	CA	33- 0-34	134.42
SAN YSIDRO BROADCASTING CORPORATION			3.15 kW	0M	116-58-11	266.89
43N	K43CC	LIC	Zn: SANTA CLARA	UT	37- 9-30	476.28
FOX TELEVISION STATIONS INC.			3.97 kW	0M	113-53-20	17.88
43Z	K43FO	LIC	Zn: LAS VEGAS	NV	35-56-46	320.74
THREE ANGELS B/CING. NETWORK, INC.			5.10 kW	0M	115- 2-34	7.94
43+	KTSB-LP	LIC	Zn: SANTA BARBARA	CA	34-27-55	413.32
J B BROADCASTING, INC.			10.00 kW	0M	119-40-38	292.91
43+	K62BN	CP	Zn: LAKE HAVASU CITY	AZ	34-36- 9	199.92
MOHAVE COUNTY BOARD OF SUPERVISORS			2.21 kW	0M	114-22-15	32.24
43Z	K43CW	LIC	Zn: TUCSON	AZ	32-24-55	457.66
POLAR BROADCASTING OF ARIZONA, INC.			10.00 kW	0M	110-42-52	98.01
43+	K43FT	CP	Zn: WILLIAMS, ETC.	AZ	35-12- 1	386.59
KSAZ LICENSE, INC.			1.62 kW	0M	112-12-13	51.68
44Z	K44DT	CP	Zn: SIMI VALLEY	CA	34-19-41	315.76
COSTA DE ORO TELEVISION, INC.			10.60 kW	0M	118-35-48	296.77
44N	K44DJ	LIC	Zn: YUCCA VALLEY	CA	34- 8-56	145.34
FRANCES H. GRAY, EXECUTOR			0.59 kW	0M	116-26-42	324.65
44N	K44AA	LIC	Zn: PAHRUMP	NV	35-58- 4	319.98
MOUNTAIN UNION TELECOM, INC.			7.12 kW	0M	115-30- 3	0.53
44-	K44DV	LIC	Zn: DAGGETT, ETC.	CA	34-53- 7	236.22
COUNTY OF SAN BERNARDINO AREA 40			0.92 kW	0M	116-53-45	328.17
44N	K44DK	LIC	Zn: KINGMAN	AZ	35- 4-53	267.84
MOHAVE COUNTY BOARD OF SUPERVISORS			0.65 kW	0M	113-54-14	33.71
44Z	K44DT	LIC	Zn: SIMI VALLEY	CA	34-19-41	315.76
COSTA DE ORO TELEVISION, INC.			10.70 kW	0M	118-35-48	296.77
50+	KPSE-LP	LIC	Zn: PALM SPRINGS	CA	33-52- 3	120.66
MIRAGE MEDIA, LLC			5.20 kW	0M	116-25-59	316.37

Table 3

LPTV / TRANSLATOR STATION ALLOCATION STUDY

Channel	Call		City	State	Lat	Distance
Applicant/Licensee					Long	Bearing
50Z	K50EW	LIC	Zn: LUCERNE VALLEY ,	CA	34-27-47	197.37
COUNTY OF SAN BERNARDINO AREA 29			1.06 kW	0M	116-52-44	321.21
50Z	K53DU	APP	Zn: HEMET ,	CA	33-41-17	145.87
LA VERTA W. AND VICTOR W. PAGE			2.30 kW	0M	116-55-32	297.75
57N	K57EV	LIC	Zn: JOSHUA TREE ,	CA	34- 9-18	134.07
COUNTY OF SAN BERNARDINO AREA 70			0.21 kW	0M	116-12- 6	332.63
57N	K57HM	CP	Zn: YUMA ,	AZ	32-40-24	120.84
RONALD AMODIA			14.70 kW	0M	114-20-13	111.78
58+	KPSP-LP	CP	Zn: CATHEDRAL CITY, ETC.,	CA	33-51-58	120.65
PALM SPRINGS TV STUDIOS, INC.			10.00 kW	0M	116-26- 5	316.27
58+	KPSP-LP	LIC	Zn: CATHEDRAL CITY-PALM ,	CA	33-51-58	120.65
PALM SPRINGS TV STUDIOS, INC.			10.30 kW	0M	116-26- 5	316.27
58N	K58DU	LIC	Zn: BULLHEAD CITY, ETC. ,	AZ	35- 2- 9	241.72
MOHAVE COUNTY BOARD OF SUPERVISORS			1.10 kW	0M	114-22-14	26.04
58N	K58BJ	LIC	Zn: LAKE HAVASU CITY ,	AZ	34-36- 9	199.95
MOHAVE COUNTY BOARD OF SUPERVISORS			2.20 kW	0M	114-22-13	32.25

Table 4

MEXICAN ALLOTMENT SPACING STUDY

prepared for

The Board of Trustees

The California State University for San Diego State University

Brawley, California

Ch. 43 5000 kW 295 m

Assignment	NAD-27 Coordinates	Distance (km) Actual	Distance (km) Required
Ensenada, BC NTSC Ch. 29	31° 53' 26" 116° 37' 50"	167.7	95
Mexicali, BC NTSC Ch. 38	32° 36' 41" 115° 29' 39"	52.5	32
San Luis Rio Colorado, SO NTSC Ch. 44	32° 28' 20" 114° 46' 57"	97.7	90
Mexicali, BC DTV Ch. 46	32° 39' 30" 115° 29' 05"	47.4	24 or less or 32 or more
Mexicali, BC DTV Ch. 47	32° 36' 41" 115° 29' 39"	52.5	24 or less or 32 or more
Tijuana, BC NTSC Ch. 57	32° 30' 05" 117° 02' 23"	155.2	95
Tijuana, BC DTV Ch. 58	32° 30' 08" 117° 02' 21"	155.1	96